

ORIGINAL

2-12-03

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**BARBARA A. WILHELM,**  
**Plaintiff**

v.

**COMMONWEALTH OF PA.;**  
**PENNSYLVANIA STATE POLICE;**

**Defendants**

:  
:  
:  
:  
:  
:  
:  
:  
:

**NO. 1:CV-01-1057**

**(JUDGE RAMBO)**

**FILED**  
**HARRISBURG, PA**

MAY 01 2003

**PLAINTIFF'S UNCONTESTED MOTION FOR AN**  
**ENLARGEMENT OF TIME TO FILE PETITION FOR**  
**ATTORNEY'S FEES AND COSTS**

MARY E. D'ANDREA, CLERK  
Per                       
Deputy Clerk

Pursuant to Fed.R.Civ.P. 6(b), plaintiff, Barbara A. Wilhelm, by and through her attorney, Nathan C. Pringle, Jr., respectfully requests an enlargement of time of three days, to and including May 5, 2003, to file plaintiff's petition for attorney's fees and costs, and in support thereof, sets forth the following:

1. On April 9, this court issued an order granting interest on damages awarded to the plaintiff in the above-captioned matter, and permitting the plaintiff to file a petition for attorney's fees no later than April 21, 2003. The order was received by plaintiff's counsel on April 10, 2003.

3. Plaintiff's counsel had previously scheduled a trip to London, England, which is scheduled to start on April 15, 2003 and scheduled to end on April 25, 2003, at 6:30 P.M.

4. As a result of the trip, plaintiff's counsel needed an additional seven days to file the petition for attorney's fees and costs.

5. The requested enlargement of time to file the petition no later than May 2, 2003 was granted.

6. During plaintiff's counsel's absence, several clients incurred problems requiring counsel's immediate attention upon his return

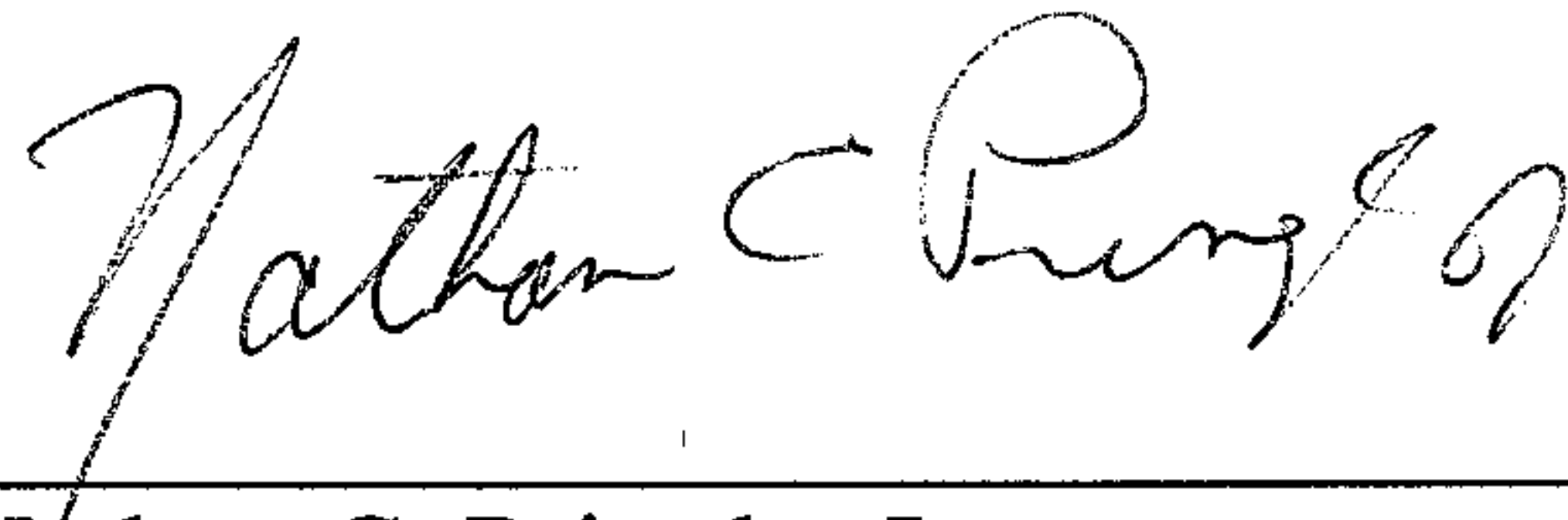
7. These problems demanded more time than anticipated.

8. A delay of three days in filing the petition will not prejudice the rights of the defendants.

9. Counsel for plaintiff has contacted defendants' counsel, Susan J. Forney, who has no objection.

**WHEREFORE**, the plaintiff, Barbara A. Wilhelm, respectfully requests an enlargement of time of three days, to and including May 5, 2003, to file a petition for attorney's fees and costs.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Nathan C. Pringle, Jr.", positioned above a horizontal line.

---

Nathan C. Pringle, Jr.  
Attorney I. D. Number 30142  
3601 North Progress Avenue  
Suite 200  
Harrisburg, PA 17110  
(717) 909-8520  
Attorney for Plaintiff

May 1, 2003

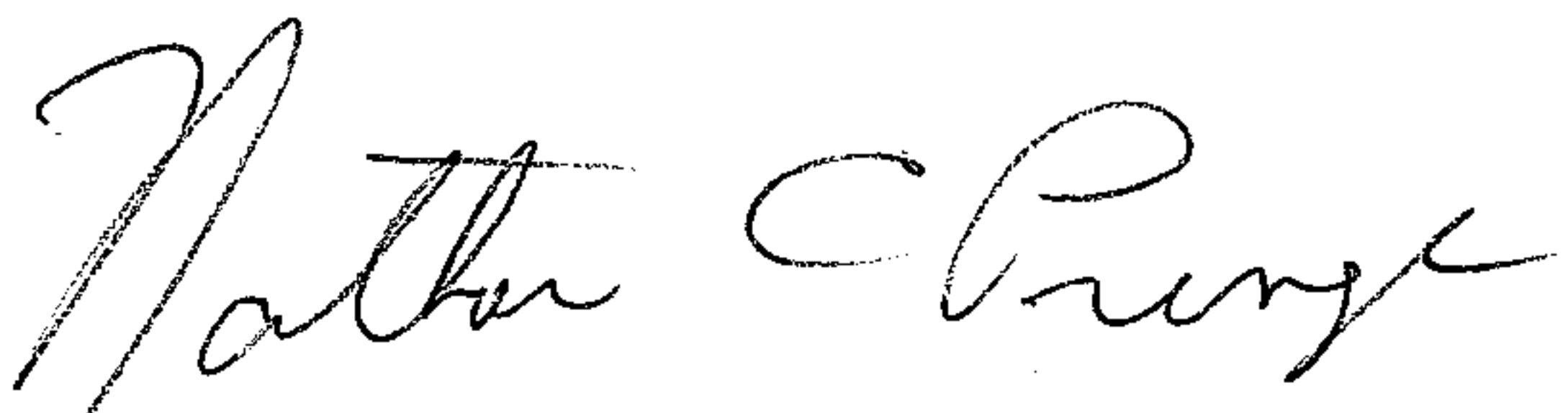




## **CERTIFICATE OF SERVICE**

I, Nathan C. Pringle, Jr., hereby certify that on May 1, 2003, I caused to be delivered by first class mail a copy of the foregoing document entitled Plaintiff's Uncontested Motion for an Enlargement of Time to File Petition for Attorney's Fees and Cost upon the following:

Susan J. Forney  
Chief Deputy Attorney General  
Office of Attorney General  
Litigation Section  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120

  
\_\_\_\_\_  
Nathan C. Pringle, Jr.